

March 8, 2015

Julie Ann Carter, Board Secretary
State of Utah Board of Oil, Gas & Mining
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SECRETARY, BOARD OF
OIL, GAS & MINING

Subject: Docket 2015-011, Cause 196-45

Fidelity Well Number 32-1-25-19. API 43-019-50037 is located in a Federal Class I air quality district close to Canyonlands National Park. Additional air pollution to this area must meet all current federal restrictions.

For over two years Fidelity Exploration & Production has been granted waivers for gas flaring based on the company's promise of completing and linking all its wells to the Dead Horse Point Lateral Pipeline. That pipeline is nearly completion, but still the company seeks a waiver to carry on flaring from this well. The company has blamed the BLM for delays in construction of the pipeline, but poor corporate planning for working within established regulations is equally responsible for the delays. It is time that the air quality for the citizens of Grand County and the half million visitors to Canyonlands National Park and Dead Horse State Park takes precedent over Fidelity's concerns about costs.

The entire area in which this well is located is close to the current 75 ppm Federal limits for ozone. Any new pollution generated by Fidelity being granted a waiver greatly increases the risk that the area will not meet the new EPA limits expected to be published in the near future.

The BLM and Fidelity guaranteed that a new pipeline near the well would stop all flaring of gas. Fidelity's request for additional flaring needs to be denied. The cost of a gathering line should not be the reason to create additional air pollution in a Class I air district.

Sincerely,

/s/ William Rau, Ph.D.

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